BRIAN YOUNG, SANDY YOUNG,)
IMOTHY CORBETT, DAVID WELLS,)
and STEVE RICHMOND,)
)
Plaintiffs,)
)
v.)
) Cause No. 3:12-cv-475 JVB-CAN
THE CITY OF SOUTH BEND Acting)
through its Police Department, DARRYL)
BOYKINS, Individually and in his Official)
Capacity as Chief of Police, KAREN)
DEPAEPE, and SCOTT DUERRING,)
)
Defendants.)

DECLARATION OF DAVID WELLS

David Wells deposes and says:

- My name is David Wells. I am over the age of eighteen and reside in St. Joseph's County, Indiana.
- 2. I am a Plaintiff in the above-captioned litigation.
- 3. I am an officer of the South Bend Police Department ("SBPD") and in the course of my employment I became familiar with Karen DePaepe, who once served as SPBD's Director of Communications.
- 4. After DePaepe was fired from her job at SBPD she and her attorney, Scott Duerring, gave numerous interviews to newspapers and television stations in

USDC IN/ND case 3:12-cv-00475-JVB-MGG document 110-7 filed 01/27/14 page 2 of 2 interviews when they were first broadcast.

- 6. In an interview with the television station ABC 57 in South Bend broadcast on May 2, 2012 she told a reporter that in the recorded telephone conversations police officers made derogatory comments about Mayor Buttigieg and racial slurs regarding former Chief of Police Darryl Boykins.
- 7. The video of that broadcast is stored on the ABC 57 web site and may be accessed through the following link: http://www.abc57.com/home/top-stories/Derogatory-comments-made-about-Boykins-and-Buttigieg-on-recordings-149924135.html
- 8. In an interview with television station ABC 57 in South Bend broadcast on May 3, 2012 she told a reporter that she heard rumors that police officers engaged in illegal conduct and that she listened to officers' recorded conversations in order to determine whether the rumors were true.
- 9. The video of that broadcast is stored on the ABC 57 web site and may be accessed through the following link: http://www.abc57.com/home/top-stories/DePaepe-Its-even-more-serious-I-think-you-need-to-deal-with-this-150088835.html

Further Declarent sayeth not.

I swear that the foregoing statements are true.

V James //(/-David Wells